

Appendix A

Responses-to-comments table

Section 16 Planning Application for Section 16 Planning Application for Proposed Hotel with Minor Relaxation of Plot Ratio and Building Height Restrictions at 201 and 203 Wai Yip Street, Kwun Tong, Kowloon (Application No. A/K14/832)

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Section 16 Planning Application for Section 16 Planning Application for Proposed Hotel with Minor Relaxation of Plot Ratio and Building Height Restrictions at 201 and 203 Wai Yip Street, Kwun Tong, Kowloon (Application No. A/K14/832)

	Departmental Comments	Responses to Comments
1.	Comments from the Urban Design Unit, Urban Design and Landscape Section, Planning Department received on 14.11.2024	
1.1	<p><u>SPS</u></p> <p>The applicant may wish to further supplement/clarify the following with aids of plan(s)/drawings(s):</p> <p>(a) Table 2.2, Table 2.5, Figure 4.1 and Para. 4.4.11 - Please review if the “tower setback” from the northwestern and southeastern site boundary as would be regarded as a building recess instead, revise the expressions accordingly to <u>ensure consistency throughout the SPS</u>, and supplement the dimension of the building recess.</p> <p>(b) With reference to the “Pedestrian Environment Improvement Scheme for Transformation of KTBA – Feasibility Study” conducted by EKEO in 2017, opportunities might be explored to enhance the attractiveness of the back alley such as the addition of lighting and public art elements etc.</p> <p>(c) Please consider providing some discussion on whether the proposed development could meet relevant criteria for consideration of minor relaxation of BH restriction as stipulated under Para. 7.4 of the Explanatory Statement of the OZP.</p>	<p>The expression of the <i>building recess</i> throughout the Planning Statement have been revised accordingly. According to the current scheme, the <i>building recess</i> provided above 3/F from the neighbouring Catic Building and Mow Hing Factory Buildings is about 11.9 - 14.7m and 9.2 - 12m respectively. The dimension is indicated on the revised floor plans for reference (i.e. Figures 3.5 to 3.12 of the Planning Statement) and enclosed in Attachment 1. It should be highlighted that the illustration is only to show the design intent to provide building recess for improving townscape. The actual dimension will be subject to actual site verification and design review and subsequent stage.</p> <p>Noted. The applicants will explore the possibility to provide lighting and public art elements at the back alley at detailed design stage and upon completion of the proposed development subject to technical feasibility after E&M and structural coordination at subsequent stages.</p> <p>The Proposed Development is considered complying with the criteria for consideration of minor relaxation of BH restrictions as stipulated in Section 7.4 of the ES of the OZP. For the discussion on the fulfilment of the relevant criteria, please refer to Section 4.7 and Table 4.1 of the Planning Statement. Please find the extracted pages in Attachment 1 for easy reference.</p>

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1.2	Para. 4.7.11 - Please consider revising this paragraph as ‘...sensitivity of the VSRs at the selected VPs is generally low from “low” to “medium to high” and ‘...at the selected VPs are considered “negligible” to “negligible/slightly adverse” ’.	Para. 4.8.11 (originally Paragraph 4.7.11) of the Planning Statement in Attachment 1 has been revised accordingly for consideration.
1.3	Figures 4.4 and 4.5 – Please revise the annotation to read as “Considerate tower disposition with sufficient building separation building recess and permeable building design.”	Figures 4.4 and 4.5 of the VIA in Attachment 2 has been revised accordingly for consideration.
1.4	It is noted that the proposed development complies with the requirement of building setback under SBDG (Para. 4.4.12 of the SPS refers), and is not subject to the requirement of building separation under SBDG (Para. 4.4.11 of the SPS refers).	Noted.
1.5	Please be advised that sunlight penetration as mentioned in the submission is not under PlanD’s purview.	Noted.
1.6	The consultant should ensure the information regarding all mentioned existing and planned / committed developments with status (i.e. approved building plans or schemes approved by the TPB) in the surrounding areas, including Section 2, Figure 4.6 etc., are correct and updated. <u>VIA</u> <u>General Comments</u>	Please be noted that the information on the existing and planned / committed developments in the surrounding areas are correct and updated. The same is also aligned with the latest planned / committed developments adopted in the TIA as confirmed with Planning Department. Please refer to the email from PlanD received on 19 November 2024 in Attachment 4 for information.
1.7	The consultant should ensure the BHs quoted for the existing and planned / committed developments in the photomontages are correct and updated. All planned / committed developments with status in the surroundings (i.e. approved building plans or schemes approved by the Town Planning Board) should be properly reflected/simulated in the report and relevant photomontages as appropriate, including but not limited to the following items:	Noted. Please refer to our responses-to-comments below.

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	<p>(a) Some planned/ committed developments, e.g. Kwun Tong Action Area, approved Application No. A/K14/773, A/K14/807, A/K14/820 etc., might be visible at VPs 6 and 7. Similar to the submitted VIA of the previous approved planning application No. A/K14/808, please annotate these developments on the photomontages for consideration by TPB.</p> <p>(b) AIA and AXA Tower Landmark East (Figures 4.6 and 4.7) –the BHs should be 196.3mPD and 196.4mPD respectively.</p> <p>(c) Figure 4.7 - Please check whether the indication of “Megabox (100mPD)” should be referring to Enterprise Square V with BH of 170mPD instead.</p> <p>(d) Figure 4.7 – Please review if OCTA Tower should be named as Harbourside HQ and if its BH should be 136.5mPD.</p>	<p>Noted. Figures 4.6 and 4.7 of the VIA in Attachment 2 have been revised to incorporate the adjacent planned / committed developments including Kwun Tong Action Area, approved Application Nos. A/K14/773, 807 and 820 for consideration.</p> <p>Figures 4.6 and 4.7 of the VIA in Attachment 2 has been revised accordingly for consideration.</p> <p>Figure 4.7 of the VIA in Attachment 2 has been revised accordingly for consideration.</p> <p>Figure 4.7 of the VIA in Attachment 2 has been revised accordingly for consideration.</p>
1.8	<p>Please ensure the base photos currently adopted in the photomontages are suitably recent for consideration by the TPB, and revise the photomontages with updated base photos.</p> <p><u>Specific Comments</u></p>	<p>Please note that base photos for Figures 4.1 and 4.7 of the VIA in Attachment 2 have been updated to reflect the latest site condition.</p>
1.9	<p>Para. 2.2.11 - As per our comment on the SPS above, please review if the “tower setback” from the neighbouring existing buildings would be regarded as building recess instead, revise the expressions accordingly and supplement the dimension of the building recess. Please review the VIA and ensure consistency with the SPS.</p>	<p>The expression of the building recess in the VIA has been revised accordingly. Regarding the dimension of the building recess, please refer to the response 1.1(a) above and the revised Para. 2.2.11 of the VIA in Attachment 2 for consideration.</p>

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1.10	<p><i>VP1 Kwun Tong Ferry Pier Square</i></p> <p>Please confirm if the Kwun Tong Ferry Pier Square is currently accessible by the public. If not, please supplement that it is currently a works area and base photo taken from a similar angle at the pavement abutting the Kwun Tong Ferry Pier Square has been adopted.</p>	<p>It is noted that the Kwun Tong Ferry Pier Square is currently undergoing renovation as part of the Kwun Tong Action Area and open space are proposed to be reprovided at this location. Thus, this VP is selected to capture the view from a similar angle at the pavement abutting the Kwun Tong Ferry Pier Square to illustrate the view from the proposed open space. Please refer to revised Para. 4.2.2 of the VIA in Attachment 2 for consideration.</p>
1.11	<p>The base photo currently adopted by the Consultant is not a recent photo suitable for consideration by the TPB as per the latest road junction layout at Hoi Yuen Road/Wai Yip Street, please update.</p>	<p>The base photo is updated accordingly. Please refer to revised Figure 4.1 of the VIA in Attachment 2 for consideration.</p>
1.12	<p><i>VP3 Junction of Tsun Yip Street and Wai Yip Street</i></p> <p>Para. 4.2.9 – Please supplement the viewing distance from the VP towards the subject site.</p>	<p>The viewing distance has been supplemented in Para. 4.2.8 of the VIA in Attachment 2 for consideration.</p>
1.13	<p>Para. 4.2.10 – Please revise to read as “...as compared to the existing 6-storey building buildings.”</p>	<p>Para. 4.2.10 of the VIA in Attachment 2 has been revised accordingly for consideration.</p>
1.14	<p><i>VP4 Kwun Tong Promenade</i></p> <p>Para. 4.2.12 –</p> <p>(a) Please replace “the Application Site is currently not visible at this VP” as “only the uppermost portion of the proposed development would be visible at this VP” to avoid confusion.</p> <p>(b) Please review if the last sentence should be revised to read as “<u>As the viewers may be distracted by sea view at the Kwun Tong Promenade</u>, the sensitivity of VSRs at this VP <u>towards the application site</u> is considered low.”</p>	<p>Para. 4.2.12 of the VIA in Attachment 2 has been revised accordingly for consideration.</p> <p>Para. 4.2.12 of the VIA in Attachment 2 has been revised accordingly for consideration.</p>

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1.15	<p>Para. 4.2.13 –</p> <p>(a) Please review if the 1st line should be revised to read as “...the Proposed Development is entirely mostly blocked by the One Harbour Square...”</p> <p>(b) As a minor portion of the proposed development would be visible from this VP, please review if the rating would be negligible to slightly adverse instead of “no visual impact”.</p>	<p>Para. 4.2.13 of the VIA in Attachment 2 has been revised accordingly for consideration.</p> <p>Para. 4.2.13 of the VIA in Attachment 2 has been revised accordingly for consideration.</p>
1.16	<p>Figure 4.4 – As per our internal checking, it seems that the bulk of the proposed development should shift slightly to the left. Please review.</p> <p><i>VP6 Kai Tak Runway Park</i></p>	<p>Noted. Figure 4.4 of the VIA in Attachment 2 has been revised accordingly for consideration.</p>
1.17	<p>Please confirm if the VP is currently accessible by the public. If not, please consider explore an alternative VP taken from a similar viewing angle.</p> <p><i>VP7 Quarry Bay Promenade</i></p>	<p>Based on recent site inspection in January 2025, this VP is currently accessible by the public.</p>
1.18	<p>Para. 4.2.21 – Please review to read as “The Application Site is currently being blocked Only portion of the proposed development would be visible due to blockage by One Harbour Square...”</p>	<p>Para. 4.2.21 of the VIA in Attachment 2 has been revised accordingly for consideration.</p>
1.19	<p>Paras. 4.2.21 and 5.3 – As per the high quality of the existing view and its location as one of the Strategic Viewing Points, please review if the sensitivity of the VP should be medium to high instead of “low”.</p>	<p>Paras. 4.2.21 and 5.3 of the VIA in Attachment 2 has been revised accordingly for consideration.</p>

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	Departmental Comments	Responses to Comments
1.20	<p>Figure 4.7 and Para. 4.2.22 –</p> <p>(a) The extent of the “20% building free zone” on the photomontages does not align with that under the Strategic Viewing Point photo on PlanD’s website. Please review and ensure consistency.</p> <p>(b) As per our internal checking, it seems that the bulk of the proposed development should shift slightly to the right and its BH is slightly underestimated. Please review, and also incorporate the rooftop structure at 132.4mPD of the proposed development in the photomontages.</p> <p>(c) As per the comment above, please advise if the proposed development with rooftop structures at 132.4mPD would encroach into the 20% building free zone, and assess its visual impact accordingly.</p> <p>(d) The base photo seems not to be a recent one for consideration by TPB, please update.</p>	<p>Noted. The extent of the “20% building free zone” has been updated to align with that under the photo of Strategic Viewing Point. Please refer to the revised Figure 4.7 of the VIA in Attachment 2 for consideration.</p> <p>Noted. The building bulk of the Proposed Development has been updated and the rooftop structure is included in the photomontage. Please refer to revised Figure 4.7 of the VIA in Attachment 2 for consideration.</p> <p>Please be advised that the rooftop structures of the Proposed Development at top roof level 132.4mPD would marginally encroach on the “20% building free zone”. However, from the same VP, the AIA Kowloon Tower Landmark East with building height 196.3mPD rightly at the back of the Proposed Development has already encroached into the “20% building free zone” and even disrupted the ridgeline of Kowloon Peak mountain range. As such, the slight encroachment on the building free zone by the proposed rooftop structures of the Proposed Development would have no additional visual impact on the ridgeline and the building free zone as viewing from this VP. The resultant visual impact at this VP is considered “negligible”. Please refer to the revised Figure 4.7 of the VIA in Attachment 2 for consideration.</p> <p>Noted. The base photo for Figure 4.7 of the VIA in Attachment 2 have been updated for consideration.</p>

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	Departmental Comments	Responses to Comments
2.	Comments from the Urban Design Unit, Urban Design and Landscape Section, Planning Department received on 20.12.2024	
2.1	The location, layout and height of rooftop structures should be clearly indicated on a plan for ease of reference.	The location, layout and level of the rooftop structures is included in the revised Figure 3.13 of the Planning Statement in Attachment 1 for consideration.
2.2	Planning Statement, Table 4.1 – (a) Criterion (d) - The location of the said building separation / recess should be clearly indicated on a plan for ease of reference. (b) Criterion (f) – The last sentence should be revised as “...that no significant adverse visual impacts would be resulted...”	The location and dimension of the building recess on each floor are indicated on the revised Floor Plans (i.e. Figures 3.5 to 3.12 of the Planning Statement) in Attachment 1 for reference. Table 4.1 of the Planning Statement in Attachment 1 has been revised accordingly for consideration.

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3.	Comments from the Transport Department received on 18.11.2024																															
3.1	Table 3.1 – Please provide the higher end provision of parking spaces and loading / unloading bays for hotel use as stipulated in HKPSG as far as practical.	<p>The car park layout has been revised to provide 3 nos. of additional private car parking spaces, 1 no. of additional motorcycle parking space and 1 no. of additional LGV loading / unloading bay. The revised provision of internal transport facilities and the revised car park layout are detailed in Table R1 below, Table 3.1 and Figures 3.1 and 3.2 of the TIA in Attachment 3.</p> <p>Table R1: Revised Provision of Internal Transport Facilities</p> <table border="1"> <thead> <tr> <th data-bbox="1115 563 1265 639">Item</th> <th data-bbox="1265 563 1496 639">HKPSG Recommendation</th> <th data-bbox="1496 563 1653 639">Previous Provision</th> <th data-bbox="1653 563 2004 639">Revised Provision (Mar 2025)</th> <th data-bbox="2004 563 2130 639">Change</th> </tr> </thead> <tbody> <tr> <td data-bbox="1115 639 1265 794">Car Parking Space</td> <td data-bbox="1265 639 1496 794">Minimum = 9 nos. Maximum = 12 nos.</td> <td data-bbox="1496 639 1653 794">9 nos.</td> <td data-bbox="1653 639 2004 794">12 nos. (including 3 sets of double-deck + 5 conventional+ 1 for persons with disabilities = HKPSG maximum)</td> <td data-bbox="2004 639 2130 794">+3 nos.</td> </tr> <tr> <td data-bbox="1115 794 1265 884">Motorcycle Parking Space</td> <td data-bbox="1265 794 1496 884">Minimum = 1 no. Maximum = 2 nos.</td> <td data-bbox="1496 794 1653 884">1 no.</td> <td data-bbox="1653 794 2004 884">2 nos. = HKPSG maximum</td> <td data-bbox="2004 794 2130 884">+1 no.</td> </tr> <tr> <td data-bbox="1115 884 1265 1011">Taxi and Private Car Layby</td> <td data-bbox="1265 884 1496 1011">Minimum 3 lay-by for taxis and private cars for 300-599 rooms</td> <td data-bbox="1496 884 1653 1011">3 nos.</td> <td data-bbox="1653 884 2004 1011">3 nos. = HKPSG recommendation</td> <td data-bbox="2004 884 2130 1011">No Change</td> </tr> <tr> <td data-bbox="1115 1011 1265 1134">Single-Deck Tour Bus Layby</td> <td data-bbox="1265 1011 1496 1134">Minimum 2-3 lay-by for single-deck tour buses for 300-899 rooms</td> <td data-bbox="1496 1011 1653 1134">3 nos.</td> <td data-bbox="1653 1011 2004 1134">3 nos. = HKPSG recommendation</td> <td data-bbox="2004 1011 2130 1134">No Change</td> </tr> <tr> <td data-bbox="1115 1134 1265 1289">Goods Vehicle Loading / Unloading Bay</td> <td data-bbox="1265 1134 1496 1289">Minimum = 3 nos. Maximum = 5 nos.</td> <td data-bbox="1496 1134 1653 1289">2 LGVs and 1 HGV = 3 nos.</td> <td data-bbox="1653 1134 2004 1289">3 LGVs and 1 HGV = 4 nos. > HKPSG minimum</td> <td data-bbox="2004 1134 2130 1289">+ 1 no. LGV</td> </tr> </tbody> </table>	Item	HKPSG Recommendation	Previous Provision	Revised Provision (Mar 2025)	Change	Car Parking Space	Minimum = 9 nos. Maximum = 12 nos.	9 nos.	12 nos. (including 3 sets of double-deck + 5 conventional+ 1 for persons with disabilities = HKPSG maximum)	+3 nos.	Motorcycle Parking Space	Minimum = 1 no. Maximum = 2 nos.	1 no.	2 nos. = HKPSG maximum	+1 no.	Taxi and Private Car Layby	Minimum 3 lay-by for taxis and private cars for 300-599 rooms	3 nos.	3 nos. = HKPSG recommendation	No Change	Single-Deck Tour Bus Layby	Minimum 2-3 lay-by for single-deck tour buses for 300-899 rooms	3 nos.	3 nos. = HKPSG recommendation	No Change	Goods Vehicle Loading / Unloading Bay	Minimum = 3 nos. Maximum = 5 nos.	2 LGVs and 1 HGV = 3 nos.	3 LGVs and 1 HGV = 4 nos. > HKPSG minimum	+ 1 no. LGV
Item	HKPSG Recommendation	Previous Provision	Revised Provision (Mar 2025)	Change																												
Car Parking Space	Minimum = 9 nos. Maximum = 12 nos.	9 nos.	12 nos. (including 3 sets of double-deck + 5 conventional+ 1 for persons with disabilities = HKPSG maximum)	+3 nos.																												
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3.1	(Con't)	<p>With the revised layout, car parking spaces and motorcycle parking spaces are provided in accordance with the high-end provision under HKPSG. Taxi and private car layby, single-deck tour bus layby and goods vehicle loading / unloading bays are provided in accordance to HKPSG standards.</p> <p>Swept path analysis was also conducted for critical movements and found to be acceptable. Please refer to the swept path analysis drawings in Appendix 2 of the revised TIA in Attachment 3 for consideration.</p>																				
3.2	Table 4.2 – Please confirm with PlanD whether the major / planned committed developments have been taken into account, in particular the KTAA development.	The adjacent planned / committed developments including the KTAA development identified in Table 4.2 of the TIA have been confirmed with PlanD. Please refer to the email from PlanD received on 19 November 2024 in Attachment 4 for information.																				
3.3	Paragraph 4.7 – Please compare the trip generations of hotels stipulated in TPDM and adopt the more conservative rates. In addition, the scale of the two referenced hotels used to derive the trip generation rates are comparatively smaller than the proposed development. Please further justify your approach and supplement with other surveys of hotels with similar scale.	<p>In addition to the two referenced hotel, surveys were conducted at 2 more hotels with more hotel rooms in Kwun Tong in November 2024. Details of these 4 hotels are details in Table R2 below, and the results of the trip generation survey conducted are detailed in Table 4.3 (also provided below) of the TIA in Attachment 3 for consideration.</p> <p>Table R2: Details of the Surveyed Hotels</p> <table border="1" data-bbox="1115 946 2134 1342"> <thead> <tr> <th>Site</th> <th>No. of Rooms</th> <th>Walking Distance from MTR Station</th> <th>Provision of Internal Transport Facilities</th> </tr> </thead> <tbody> <tr> <td>Nina Hotel at 38 Chong Yip Street, Kwun Tong</td> <td>254</td> <td>280m (Ngau Tau Kok Station)</td> <td>Yes</td> </tr> <tr> <td>Tuen Mun Pentahotel at 6 Tsun Wen Road, Tuen Mun</td> <td>298</td> <td>400m (Tuen Mun Station)</td> <td>Yes</td> </tr> <tr> <td>Dorsett Kwun Tong at 84 Hung To Road, Kwun Tong</td> <td>360</td> <td>600m (Kwun Tong Station)</td> <td>Yes</td> </tr> <tr> <td>Hotel Cozi Harbour View at 163 Wai Yip Street, Kwun Tong</td> <td>598</td> <td>450m (Ngau Tau Kok Station)</td> <td>Yes</td> </tr> </tbody> </table>	Site	No. of Rooms	Walking Distance from MTR Station	Provision of Internal Transport Facilities	Nina Hotel at 38 Chong Yip Street, Kwun Tong	254	280m (Ngau Tau Kok Station)	Yes	Tuen Mun Pentahotel at 6 Tsun Wen Road, Tuen Mun	298	400m (Tuen Mun Station)	Yes	Dorsett Kwun Tong at 84 Hung To Road, Kwun Tong	360	600m (Kwun Tong Station)	Yes	Hotel Cozi Harbour View at 163 Wai Yip Street, Kwun Tong	598	450m (Ngau Tau Kok Station)	Yes
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3.3	(Con't)	<p>Table 4.3: Results of Trip Generation Survey</p> <table border="1" data-bbox="1115 268 2130 555"> <thead> <tr> <th rowspan="3">Items</th> <th colspan="4">Trip Generation Rate in pcu/hr/rooms</th> </tr> <tr> <th colspan="2">AM Peak</th> <th colspan="2">PM Peak</th> </tr> <tr> <th>In</th> <th>Out</th> <th>In</th> <th>Out</th> </tr> </thead> <tbody> <tr> <td>Nina Hotel</td> <td>0.0591</td> <td>0.0433</td> <td>0.0512</td> <td>0.0472</td> </tr> <tr> <td>Tuen Mun Pentahotel</td> <td>0.0369</td> <td>0.0336</td> <td>0.0336</td> <td>0.0336</td> </tr> <tr> <td>Dorsett Kwun Tong</td> <td>0.0361</td> <td>0.0333</td> <td>0.0361</td> <td>0.0333</td> </tr> <tr> <td>Hotel Cozi Harbour View</td> <td>0.0084</td> <td>0.0151</td> <td>0.0134</td> <td>0.0167</td> </tr> <tr> <td>Maximum Rate</td> <td>0.0591</td> <td>0.0433</td> <td>0.0512</td> <td>0.0472</td> </tr> </tbody> </table> <p>Comparison of trip generation for hotel between in-house survey and lower limit taken from TDPM is detailed in Table 4.4 (also provided below) of the TIA in Attachment 3 for consideration.</p> <p>Table 4.4: Comparison of In-house Trip Generation for Hotel and Lower Limit of Rates from TPDM</p> <table border="1" data-bbox="1115 786 2130 1034"> <thead> <tr> <th rowspan="3">Items</th> <th colspan="4">Trip Generation Rate in pcu/hr/rooms</th> </tr> <tr> <th colspan="2">AM Peak</th> <th colspan="2">PM Peak</th> </tr> <tr> <th>In</th> <th>Out</th> <th>In</th> <th>Out</th> </tr> </thead> <tbody> <tr> <td>In-house maximum rate (Table 4.3) [a]</td> <td>0.0591</td> <td>0.0433</td> <td>0.0512</td> <td>0.0472</td> </tr> <tr> <td>Trip Generation rate for Hotel from TPDM⁽¹⁾ [b]</td> <td>0.0832</td> <td>0.0843</td> <td>0.0908</td> <td>0.0883</td> </tr> <tr> <td>Difference: [b] – [a]</td> <td>0.0241</td> <td>0.0410</td> <td>0.0396</td> <td>0.0411</td> </tr> </tbody> </table> <p>⁽¹⁾: lower limit of rates from TPDM</p> <p>Table 4.4 shows that the surveyed hotel trip generation rates in Table 4.3 are <u>lower</u> than the lower limit of rates for Hotel found in the TPDM. Hence, to be conservative, the lower limit of trip generation rates from TPDM is adopted to estimate the traffic generation for Proposed Redevelopment. The calculated traffic generation associated with the Proposed Development are presented in Table 4.5 of the TIA in Attachment 3 for consideration.</p> <p>The 2032 junction operational performance has also been re-calculated and is presented in Table 4.7 of the TIA in Attachment 3 for consideration.</p>	Items	Trip Generation Rate in pcu/hr/rooms				AM Peak		PM Peak		In	Out	In	Out	Nina Hotel	0.0591	0.0433	0.0512	0.0472	Tuen Mun Pentahotel	0.0369	0.0336	0.0336	0.0336	Dorsett Kwun Tong	0.0361	0.0333	0.0361	0.0333	Hotel Cozi Harbour View	0.0084	0.0151	0.0134	0.0167	Maximum Rate	0.0591	0.0433	0.0512	0.0472	Items	Trip Generation Rate in pcu/hr/rooms				AM Peak		PM Peak		In	Out	In	Out	In-house maximum rate (Table 4.3) [a]	0.0591	0.0433	0.0512	0.0472	Trip Generation rate for Hotel from TPDM ⁽¹⁾ [b]	0.0832	0.0843	0.0908	0.0883	Difference: [b] – [a]	0.0241	0.0410	0.0396	0.0411
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	Departmental Comments	Responses to Comments
3.4	A traffic management plan with effective and workable measures to avoid adverse impact on the surrounding public roads should be included. Particularly, measures for assuring the turntable functioning at all times should be proposed.	<p>All users are required to make reservation with the property management prior to the using of the goods vehicle loading / unloading bay and coach lay-by. In the event of maintenance or break-down of the used by HGVs and coaches, all users will be notified that the use of HGV loading / unloading bay and coach lay-by will be temporarily suspended.</p> <p>The driveway from G/F (i.e. run-in/out at Wai Yip Street) to B1/F (i.e. turntable) is about 50m long and the loading/unloading activities related to goods deliveries and pick-up/drop-off activities by coaches will take place during the non-peak hours. As such, it is unlikely that any vehicle queue will tailback to Wai Yip Street.</p>
3.5	Please advise the operation of refuse collection vehicles.	The refuse will be collected by trolleys and delivered to the Kei Yip Lane Refuse Collection Point, which is only 4 minutes' walk away.
3.6	LOS assessment for all footpaths and pedestrian crossing including waiting areas from major bus stops to the proposed development should be included. Improvement measures should be proposed when necessary.	Please refer to Section 5 – Pedestrian Assessment of the TIA in Attachment 3 for consideration.
3.7	Figure 3.1 – The proposed private car / taxi lay-bys are isolated from the hotel lobby. Please review and provide appropriate access.	An access road from the private car / taxi lay-bys to the hotel lobby has been incorporated in the revised layout. Please refer to Figure 3.1 of the TIA in Attachment 3 for consideration.
3.8	Figure 3.2 – You are advised to maximize the utilization of space for parking purposes. Please review the layout and provide more motorcycle parking spaces.	The provision of internal transport facilities have been maximised by providing 3 nos. of additional private car parking spaces to a total of 12 nos. of private car parking spaces, 1 no. of additional motorcycle parking space to a total of 2 nos. of motorcycle parking space and 1 no. additional LGV loading / unloading bay to a total of 3 nos. of LGV and 1 HGV loading and unloading bays.

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3.9	Appendix 1 – The R.C. of signal junctions J1, J4 and J5 seems unrealistically high. Please critically review.	<p>The existing junction operation performance has been updated. It should be noted that kerbside activities and site factors has been applied in J1, J4 and J5 of the junction analysis. Please refer to the revised existing operational performance of the junctions in Table 2.1 of the revised TIA in Attachment 3 for consideration.</p> <p>Revised year 2032 capacity analysis for the cases without and with the Proposed Development are also summarized in Table 4.7 and detailed calculations could be found in the Appendix 1 of the revised TIA in Attachment 3 for consideration.</p>

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4.	Comments from the Environmental Protection Department received on 12.12.2024	
	<u>Comment on Drainage and Sewerage Impact Assessment</u>	
4.1	Appendix 2.1 Table 1 to 10- The previous comment has not been fully addressed: Please adopt litre/sec as the unit for peak flow, for the avoidance of doubt.	Noted. Litre/sec is adopted as the unit for peak flow and peak flow shown in m ³ /day is removed in Appendix 2.1 of the revised DSIA in Attachment 5 for consideration.
4.2	<p>Appendix 2.1 Table 8 & 9 –</p> <p>(a) The value of ks for “the calculation of slimed concrete sewer, poor condition, with velocity flowing half full to be approximately 0.75m/s for proposed pipes” is incorrect, please review.</p> <p>(b) Appendix 2.1 Table 8 & 9- It is noted that some of the invert levels are based on assumption, please verify the assumed invert levels during site surveys at the later stage.</p>	<p>Noted. The relevant remarks are removed from the tables in Appendix 2.1 of the revised DSIA in Attachment 5 for consideration.</p> <p>Site survey shall be conducted during detail design stage. Please find the additional remarks in Table 8 & 9 of Appendix 2.1 of the revised DSIA in Attachment 5 for consideration.</p>
4.3	Please re-visit the assessment based on above comments.	Noted. The DSIA has been revised based on the comments received. Please find the revised DSIA in Attachment 5 for consideration.
4.4	Please note that the implementation of sewerage works shall also meet the satisfaction of the Drainage Services Department.	Noted.

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5.	Comments from the District Planning Office/Kowloon, Planning Department received on 30.12.2024	
5.1	It is noted that the applicant has proposed a weather protection canopy along the Wai Yip Street frontage (with a proposed length of 39.6m, width of 1.5m, height of 5.0m [subject to detailed design]). While G/F plan (Figure 3.2) and the illustrative section showing planning and design merits (Figure 4.2) have been revised, the indicative 1/F plan and indicative section plan should also be revised for demonstration.	The proposed weather protection canopy along Wai Yip Street has been included in indicative 1/F plan and indicative section plan. Please refer to Figures 3.3 and 3.14 of the Planning Statement in Attachment 1 for consideration. With incorporation of the weather canopy, the Development Schedule has also been updated accordingly (please see Attachment 1).
5.2	Please clarify the percentage of greenery provided in the primary zone as 68% seems unrealistic (since the overall greenery is just 29%).	Para. 4.4.8 of the Planning Statement in Attachment 1 is revised accordingly for consideration. Please be clarified that the proposed <i>overall</i> greenery ratio is about 29%. In the greenery provision, about 20% of the greenery is located in the primary zone.
5.3	Para.4.4.6- It appears that the paragraph has not been revised as claimed. The current application agglomerates two previously approved planning application, as observed from the location plan, it is hardly justified that the site is still 'elongated' but rather 'square' in shape. It is noted that your justification for an optimal design on G/F only involves the provision of setback which accounts for about 11.6% of the site area. Please supplement.	Please note that the description of the Application Site as 'elongated' was deleted in the previous submission dated 22.11.2024. Also, apart from the site constraint of the provision of setbacks, areas reserved for vehicle manoeuvring, and the provision of car park and L/UL facilities on G/F to meet HKPSG requirements also restrain the design of G/F. As such, the current design for G/F is considered optimal.
5.4	It is observed from the breakdown of hotel rooms, only 19% are studio type rooms while the rest are suite type. This split is quite different to the typical hotel development. Please supplement. While it is justified that the breakdown is for indicative purpose and will be subject to design review, your attention is drawn to TPB Guidelines No. 36C regarding change in number of units at a later stage, should the application is approved.	Noted. All subsequent possible changes in the number of units will make reference to the TPB Guidelines No. 36C. For information, the hotel room mix currently proposed is based on the Applicant's analysis of the market condition. The current proposed hotel development will provide a different choice of hotel in the market and hence be more attractive for future customers. It is considered to be more viable and sustainable under the current evolving market condition.